

CARUSO GLYNN, LLC

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Attorney: Lawrence C. Glynn (LG-6431)
CG File No.: 88.071108.01

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CARUSO GLYNN, LLC,

Case No.: 11 Civ. 4360 (VB)

Plaintiff,

NOTICE OF MOTION

-against-

SAI TRUST and ROBERT MEMBRENO,
Individually and as Trustee for SAI TRUST,

Defendants.

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PLEASE TAKE NOTICE, that upon the annexed Affirmation of Lawrence C. Glynn dated February 15, 2013 and exhibits annexed thereto, Plaintiff's Statement of Material Facts Pursuant to Local Rule 56.1, the accompanying Memorandum of Law and upon all prior pleadings and proceedings had in this action, the undersigned will move this Court on the 22nd day of March, 2013 or as soon thereafter as counsel may be heard before the Honorable Vincent L. Briccetti, at the United States Courthouse, 300 Quarropas Street, White Plains, New York 10601 for an Order pursuant to Fed. R. Civ. P. 56 granting summary judgment to Plaintiff and for such other and further relief as this Court may deem just and proper.

Dated: New York, New York
February 15, 2013

Yours, etc.,

CARUSO GLYNN, LLC
Pro Se

By: /s/ *Lawrence C. Glynn*

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